

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Michael F. Chekian, SBN 165026 Chekian Law Office 445 South Figueroa St., Ste. 3100 Los Angeles, CA 90071 Voice (310) 390-5529 Facsimile (310) 451-0739 email mike@cheklaw.com	FOR COURT USE ONLY
<input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Plaintiff Christian F.C. Gadbois	
<b>UNITED STATES BANKRUPTCY COURT</b> <b>CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re: Christian F.C. Gadbois,    <div style="text-align: right;">Debtor(s).</div>	CASE NO.: 2:19-bk-10187-VZ  ADVERSARY NO.: 2:21-ap-01158-VZ  CHAPTER: 13
Christian F.C. Gadbois,    <div style="text-align: right;">Plaintiff(s).</div> <div style="text-align: center;">vs.</div> Minter Field Airport District, a special district formed under the California Airport District Act; and Does 1-5, Inclusive   <div style="text-align: right;">Defendant(s).</div>	<div style="text-align: center;"> <b>JOINT STATUS REPORT</b>  <b>[LBR 7016-1(a)(2)]</b> </div> <div style="padding-top: 10px;">             DATE: 09/30/2021              TIME: 10:30 a.m.              COURTROOM: 1368              ADDRESS: 225 E. Temple Street, Los Angeles, CA 90012           </div>

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

**A. PLEADINGS/SERVICE:**

- |   |   |  |
|---|---|--|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 2. Have all parties filed and served answers to the Claims Documents?                                 | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 3. Have all motions addressed to the Claims Documents been resolved?                                  | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1?                                      | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):
- Defendant intends to file a motion for judgment on the pleadings. Plaintiff is considering a motion for leave to amend the Complaint.

**B. READINESS FOR TRIAL:**

1. When will you be ready for trial in this case?
- |               |                  |            |                  |
|---------------|------------------|------------|------------------|
| February 2022 | <u>Plaintiff</u> | April 2022 | <u>Defendant</u> |
|---------------|------------------|------------|------------------|
2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.
- |  |   |
|--|---|
| <u>Plaintiff</u>   | <u>Defendant</u>  |
| Allow more time for discovery, settlement discussions and pre-trial motions. | If this case is not resolved on motion, counsel's ability to prepare for trial is limited through January due to other pressing administrative and litigation matters |
3. When do you expect to complete your discovery efforts?
- |                  |                  |               |                  |
|------------------|------------------|---------------|------------------|
| December 6, 2021 | <u>Plaintiff</u> | February 2022 | <u>Defendant</u> |
|------------------|------------------|---------------|------------------|
4. What additional discovery do you require to prepare for trial?
- |   |   |
|---|---|
| <u>Plaintiff</u>  | <u>Defendant</u>  |
| At least one round of written discovery and possible depositions of 1 or 2 individuals. | At least one round of written discovery and possible depositions of 1 or 2 individuals. |

**C. TRIAL TIME:**

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?
- |         |                  |         |                  |
|---------|------------------|---------|------------------|
| 6 hours | <u>Plaintiff</u> | 6 hours | <u>Defendant</u> |
|---------|------------------|---------|------------------|
2. How many witnesses do you intend to call at trial (*including opposing parties*)?
- |     |                  |     |                  |
|-----|------------------|-----|------------------|
| 4-8 | <u>Plaintiff</u> | 3-5 | <u>Defendant</u> |
|-----|------------------|-----|------------------|

3. How many exhibits do you anticipate using at trial?

Plaintiff  
20-40

Defendant  
10-30

**D. PRETRIAL CONFERENCE:**

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff  
Pretrial conference ☒ is ☐ is not requested  
Reasons:  
Save Court's and parties' time.

Defendant  
Pretrial conference ☒ is ☐ is not requested  
Reasons:  
Save Court's and parties' time.

Plaintiff  
Pretrial conference should be set after:  
(date) 01/03/2022

Defendant  
Pretrial conference should be set after:  
(date) 03/01/2022

**E. SETTLEMENT:**

1. What is the status of settlement efforts?

Counsel discussed settlement possibilities by phone on September 20, 2021 and are discussing options with their respective clients.

2. Has this dispute been formally mediated? ☐ Yes ☒ No  
If so, when?

3. Do you want this matter sent to mediation at this time?

Plaintiff  
☐ Yes ☒ No

Defendant  
☐ Yes ☒ No

**F. FINAL JUDGMENT/ORDER:**

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment  
and/or order in this adversary proceeding.

Defendant

☐ I do consent

☒ I do not consent

to the bankruptcy court's entry of a final judgment  
and/or order in this adversary proceeding.

**G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)**

Plaintiff may file a motion for leave to amend the complaint.

Defendant intends to file a motion for judgment on the pleadings and, if necessary, a motion for summary judgment.

Respectfully submitted,

Date: 09/22/2021

Chekian Law Office  
Printed name of law firm

/s/ Michael Chekian  
Signature

Michael Chekian  
Printed name

Attorney for: Plaintiff C. Gadbois

Date: 09/22/2021

Young Wooldridge, LLP  
Printed name of law firm

  
Signature

Brett Stroud  
Printed name

Attorney for: Minter Field Airport District

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
445 South Figueroa Street, 31st Floor, Los Angeles, CA 90071

A true and correct copy of the foregoing document entitled (*specify*): JOINT STATUS REPORT [LBR 7016-1(a)(2)] will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) September 23, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Chapter 13 Trustee Nancy K Curry: trustee12la@aol.com  
Attorney for Debtor Michael Chekian: mike@cheklaw.com  
United States Trustee (LA): ustpreion16.la.ecf@usdoj.gov  
Minter Field Airport District: bstroud@youngwooldridge.com  
Minter Field Airport District c/o D. Max Gardner: dmgardner@dmxlaw.com

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

09/23/2021  
Date

Michael Chekian  
Printed Name

/s/ Michael Chekian  
Signature